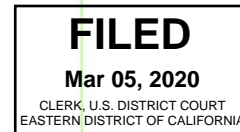


WALTER CURRIE
Name and Prisoner/Booking Number
Mule Creek State Prison
Place of Confinement
P.O. Box 409220
Mailing Address
Long California 95670
City, State, Zip Code



(Failure to notify the Court of your change of address may result in dismissal of this action.)

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

WALTER CURRIE
(Full Name of Plaintiff) Plaintiff,

v.

(1) Gov. Gavin Newsom
(Full Name of Defendant)

(2) Ex-Gov Jerry Brown

(3) Det. L. Salazar, Warden MCSF

(4) Scott Kerman

Defendant(s). ET AL

☐ Check if there are additional Defendants and attach page 1-A listing them.

CASE NO. 2:20-cv-0503 KJN (PC)

(To be supplied by the Clerk)

"DEMANDING A JUST TRIAL"

CIVIL RIGHTS COMPLAINT
BY A PRISONER

- ☒ Original Complaint
☐ First Amended Complaint
☐ Second Amended Complaint

A. JURISDICTION

1. This Court has jurisdiction over this action pursuant to:

☒ 28 U.S.C. § 1343(a); 42 U.S.C. § 1983

☐ 28 U.S.C. § 1331; Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971).

☐ Other: _____

2. Institution/city where violation occurred: Mule Creek State Prison P.O. Box 409220 Long California 95670.

SHORT TITLE:

CASE NUMBER:

*ADDITIONAL DEFENDANTS**[ALL DEFENDANTS ARE BEING SUED IN THEIR OFFICIAL & INDIVIDUAL CAPACITY].**5. Ralph M. Diaz**6. Diana Tache**7. Connie Gipson**8. Terry Becker-Court**9. Tamir Ahmed**10. Gregory Larnabee**11. Harold Hold**12. Andrew Altevogt**13. City of Jone**14. County of Amador*

(Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, **not** line numbers):

This page may be used with any Judicial Council form or any other paper filed with the court.

Page *11*

B. DEFENDANTS

1. Name of first Defendant: Gavin Newsom. The first Defendant is employed as:
Governor of the State of California at State Capitol of Sacramento CA.
(Position and Title) (Institution)
2. Name of second Defendant: Serry Brown. The second Defendant is employed as:
Ex. Governor of the State of California at UNKNOWN.
(Position and Title) (Institution)
3. Name of third Defendant: Joe Lizarra. The third Defendant is employed as:
Warden at Alameda State Prison.
(Position and Title) (Institution)
4. Name of fourth Defendant: Scott Keweenaw. The fourth Defendant is employed as:
Deputy Director Ex at OVER CDDK STATE PRISON.
(Position and Title) (Institution)

If you name more than four Defendants, answer the questions listed above for each additional Defendant on a separate page.

C. PREVIOUS LAWSUITS

1. Have you filed any other lawsuits while you were a prisoner? ☐ Yes ☒ No
2. If yes, how many lawsuits have you filed? _____. Describe the previous lawsuits:
 - a. First prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____
 - b. Second prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____
 - c. Third prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____

If you filed more than three lawsuits, answer the questions listed above for each additional lawsuit on a separate page.

SHORT TITLE:

CASE NUMBER:

ADDITIONAL DEFENDANTS?

[All Defendants? are being sued in their official & individual capacity,].

5. Name of Fifth Defendant. Ralph M. Diaz. The Fifth Defendant is Employed as:Deputy Director at Orcutt State Prison System.
(Position And Title) (Institution)6. Name of Sixth Defendant. Diana Tache. The Sixth Defendant is Employed as:The Secretary of Health Care at Orcutt State Prison System.
(Position And Title) (Institution)7. Name of Seventh Defendant. Carrie Givens. The Seventh Defendant is Employed as:The Deputy Director of Facility Operation at Orcutt State Prison System.
(Position And Title) (Institution)8. Name of Eighth Defendant. Terry Butler Court. The Eighth Defendant is Employed
as: Regional Facilities Manager at Orcutt State Prison System.
(Position And Title) (Institution)9. Name of Ninth Defendant. Tamie Abbott. The Ninth Defendant is Employed as:Associate Director at Orcutt State Prison System.
(Position And Title) (Institution)10. Name of Tenth Defendant. Gregory L. Lott. The Tenth Defendant is Employed as:Environmental & Regulatory Compliance at _____.
(Position And Title) (Institution)11. Name of Eleventh Defendant. Harold Hall. The Eleventh Defendant is Employed as:Supervisor Worker at Central Valley Regional Water Quality Control Board Compliance.
(Position And Title) (Institution)

&

(Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, not line numbers):

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Page 11

SHORT TITLE:

CASE NUMBER:

ADDITIONAL DEFENDANTS

1 ALL DEFENDANTS ARE BEING SUED IN THEIR OFFICIAL & INDIVIDUAL CAPACITY.

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12 12. Name of Twelfth Defendant. Patricia Alvarez. The Twelfth Defendant is Employed as:

13 Assistant Executive Officer at Central Valley Regional Water Quality Control Board
 14 (Position and Title) (Institution)

15 13. Name of Thirteenth Defendant. City of Los Angeles. The Thirteenth Defendant is

16 Employed as: City at Los Angeles.
 17 (Position and Title) (Institution)

18 14. Name of Fourteenth Defendant. County of Los Angeles. The Fourteenth Defendant is

19 Employed as: County at Los Angeles.
 20 (Position and Title) (Institution)

21

22

23

24

25

26 (Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, not line numbers):

27

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D. CAUSE OF ACTION

CLAIM I

1. State the constitutional or other federal civil right that was violated: 8th Amendment Const Violation
"Protection Against Cruel and Unusual Punishment" (To Safe, Clean Drinking Water.)
2. Claim I. Identify the issue involved. Check only one. State additional issues in separate claims.
- | | | | |
|--|---|---|---------------------------------------|
| <input checked="" type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |
3. Supporting Facts. State as briefly as possible the FACTS supporting Claim I. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.
- Plaintiff asserts that all named defendants are civilly liable under the 8th amendment violation. Gavin Newsum, Gov.; Jerry Brown, Ex Gov.; Joe Lieberman, Ex. Member of MSP; Scott Brown, Ex. Deputy Director of CCR; Ralph M. Diaz, Deputy Director of CCR; Dina Tache, Secretary of Health Care for CCR; Connie Givens, Deputy Director of Facility operation of CCR; Terry Butler-Court, Regional Facilities Mgr.; Tami Plourd, Associate Director of CCR; Gregory Cordeiro, Chief Environmental Regulatory Compliance; Harold Hall, Supervisor Worker (C.R.S.W.O.C.B.); Andrew Alirogi, Assistant Executive officer (C.R.S.W.O.C.B.); City of Toro; The County of Butte.
1. Plaintiff asserts that Defendants Gavin Newsum Gov. & Jerry Brown, Ex Gov. are liable.
2. Plaintiff asserts that [I] have suffered Grievous Injury from the above named defendants by being forced to suffer the (Tubercule, and Flegarding Treatment of being forced to consume hot baths with a water supply at mass that is contaminated with "Industrial Waste, and human waste.")
4. Injury. State how you were injured by the actions or inactions of the Defendant(s).
- Plaintiff injury is an ongoing cough everyday throughout the day where it pains my insides with Joint Pain aches and dizziness
5. Administrative Remedies:
- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☐ Yes ☒ No
 - Did you submit a request for administrative relief on Claim I? ☐ Yes ☒ No
 - Did you appeal your request for relief on Claim I to the highest level? ☐ Yes ☒ No
 - If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. Order 8549 Whistle Blower's Act & plaintiff need not Exhaust Administrative Remedies To File A Suit. California State Auditor Case No 12019-1762

D. Cause Of Action Claim I
Continued as P. 3 &

3. Plaintiff asserts that defendants' Joe Lizarraga, MCSF's ex warden are civilly liable, along with his superiors: As these unsafe, and unhealthy living conditions are under his direct supervision with complete knowledge of the contaminated water at mosp. (ECDCI) deputy directors, and those named defendants, are aware of the prison systems' contamination of water supply problem along with mosp.

Gregory Larrabee, chief environmental regulatory compliance: Harold Hold, Supervisor Worker [C.V.R.W.D.C.B]: Andrew Mierogi, Assistant Executive officer [C.V.R.W.D.C.B]: Are also civilly liable as they were are of the seriousness of the contaminated water at mosp.

And as this is a seriously bad problem (no one has informed the prison population.

4. Plaintiff asserts that there are infact currently no less than #7 sites on "A-facility MCSF" alone that show clearly visible signs of mixed water with an oil base seepage clearly from some broken pipes located underground. Several of these pipes, & sites can clearly be determined to be sewage pipes.) which are located in the following areas of the yard of (A-facility).

- a) A sewage pipe located between the Education Room Door, and the chapel door approx. 10 ft. out from the wall in the grass.
- b) A sewage pipe located between the canteen window, and the medical room door approx. 10 ft. out from the wall in the grass.

c.) A sewage pipe's & water supply pipes, located near building #2. between the exercise area of parallel workout bars, And the dirt track approx. 20 ft. or so straight out from the parallel bars next to the dirt track.

d.) Sewer pipe under the light pole, in front of Yard Gate.

e.) Water pipe in front of the 4th bathroom area on the inside grass area of the asphalt track.

f.) Water pipe located in the sprinkler box located in front of building #4 on the inside of the asphalt track.

g.) Water, and sewer pipes located next to building #5 #1.

h.) Water, and sewer pipes located between building #5 Yard Door, and the Handball Court coming out of the ground.

These are merely the visibly broken pipes you can see are broken, due to there being water seepage with a (Dark Black Oil'ly Film) [in which you can smell the odor of sewage, gas, and oil.]

And on certain days, the strong smells of gas come out of those sewer pipes, are enough to give an extremely bad headache.

And the smell of raw sewage is close to constant odor. There are often muddy sink holes from the water seepage even when there's been no rain and you can see that the water is contaminated with a dark oil'ly like film as it is just sitting in puddles.

It can be determined from the different puddles of water sitting as stated when there's been no rain it would be only common sense that there is a crack / break / causing leaks for there to be water sitting. And this contamination of water above ground upon soft dirt.

1 The smell of feces is also a common smell in the water, along
 2 with a strong odor of dirt. Which is very strong for 30, to min
 3 in the building during daytime when the showers start running
 4 and in the mornings in the cell when using the sink.
 5 There has been construction of heavy equipment driving around
 6 the yard close to #3 years prior now on the soft soil where
 7 pipes old, and corroded are at.

8 And the statement of "THE OLD, AND CORRODED PIPES ARE THAT
 9 OF CORK STAFF CONFIRMING THAT MANY SEWER PIPES IN THE
 10 FACILITY WERE CAST IRON. AND THAT WITH 30 YEARS OF
 11 CORROSIVE SEWAGE MOVING THROUGH THE PIPES. IT HAS CORRODED
 12 MANY OF THE PIPES. CORK FAILED TO INVESTIGATE THESE PIPES AS
 13 PROPOSED IN THEIR APPROVED STORM WATER INVESTIGATION WORKPLAN."
 14 Now barring the fact mosp's growth in prisoner's from an
 15 occupied 1,700 prisoner's in 1989 the year. And in dec 1994
 16 the 15th day, the city of lene, took CORK to court for
 17 violations over Environmental Quality Act (CEQA). For violation
 18 of its original MOSP Contract.

19 In 1989, MOSP, had 3,996 prisoners with 1,000 staff, and
 20 the prisons system ran at 230 percent of its designed
 21 capacity.

22 Currently MOSP population is 6,315 which is well over that 3,968
 23 prisoners, and 1,425 staff member.

24 Which has well went beyond what the capacity of wear on the cast
 25 iron pipes but CORK knew this. Yet has not fixed the problem then.
 26 And now the prison is at such a level of contamination of its water.
 27 Where plaintiff has gotten injury from water that is not safe to
 28 drink.

5.) Plaintiff asserts that the statements are quoted by one ANDERSON DAVID, who was hired by CDCR.

"I WAS TOLD I WAS BUILDING A CULVERT TO PROTECT WILDLIFE. I NOW KNOW THAT IT HAD NOTHING TO DO WITH PROTECTING BIRDS AND WILDLIFE. THE GOAL FOR CDCR WAS TO HIDE INDUSTRIAL AND DOMESTIC SEWAGE DISCHARGES IN AN UNDERGROUND PIPE." Said ANDERSON. "BIRDS AREN'T DYING FROM THE ELECTRIC FENCE. THEY ARE DYING FROM THE WATER ITSELF."

Further defendants did in fact hire a testing facility from MIAMI FLORIDA, in which does not utilize the Federal ENVIRONMENTAL PROTECTION AGENCY STANDARDS, or Regulations for Testing, to test water samples from MDCSP, and even falsified reports given to state and federal agencies regarding, and to conceal the fact that the "20 Design Prisons" in California (AL) suffer from a severe design flaw which jeopardizes the safety of Ten's of Thousand's of prisoners, and their visitors by subjecting them to the same treatment suffered by the plaintiff."

6.) Plaintiff asserts that at no point has MDCSP's Warden Lee Lissman, nor CDCR, put out a ("Memo / Memorandum") to inform plaintiff of the seriousness of this contamination of water that plaintiff is forced to drink, and bathe in. Had it not been for plaintiff complaining to family about the pains, and injuries listed that I was suffering she would never went on line, and plaintiff's medical nurses further informed plaintiff that the water is really bad to drink

1 plaintiff wouldn't have known the true extent of the problem.

2 This water has harmed plaintiff where medical had to
3 provide medication.

4 Free Staff, %'s, & Nurses have mentioned numerous ly at MCSF
5 that they where advised by way of a computer generated memo
6 informing them not to drink the water.

7 It is also alleged to be signs posted in the visiting room area
8 advising visitors not to drink the water.

9 There are signs outside of MCSF stating "Do Not Let Your
10 Children, or (PETS) Come In Contact With The Water From Male
11 Creek State Prison, stating [BIOHAZARD] File CW-241842 Regional
12 Water."

13 Even the Nurses, and Doctors say that inmates should boil
14 their water before drinking it. Plaintiff has no way of
15 boiling his water due to the prison not allowing hot pots
16 that boil.

17 Plaintiff will reiterate that MCSF's population has never
18 been informed as to the drinking, and bath water's
19 contaminated. It is alleged that there are signs
20 posted in the visiting room area's.

21 It is an obligated duty of MCSF's Warden as well as
22 CDCR Employees to inform warn, plaintiff and the
23 population of this contaminated water. Along with
24 providing Bottled Water.

25 Where the source of the Contamination Problem that has
26 plagued the prison and City of Lone, along with the County
27 of Amador.

28

CLAIM II

1. State the constitutional or other federal civil right that was violated: Fourteenth Amendment
State Const. Violation: "Equal Protection."

2. Claim II. Identify the issue involved. Check only one. State additional issues in separate claims.

- | | | | |
|--|---|---|---------------------------------------|
| <input checked="" type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |

3. Supporting Facts. State as briefly as possible the FACTS supporting Claim II. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

Plaintiff asserts that all named Defendants are civilly liable under the Fourteenth Amendment. Ex. Gov. Nelson; Ex. Gov. Scott Brown; Joe Lieberman, Warden MSC; CDCR: Scott Brown, Ex. Deputy Director; Ralph M. Diaz, Deputy Director; Diana Telle, Secretary of Health Care CDCR; Gwendolyn Green, Deputy Director of Facility Operations CDCR; Taki Brown, Regional Facilities Mgr.; Janice Arnesen, Associate Director CDCR;

All the above named Defendants are in violation of plaintiff's Fourteenth Amendment as they all lost the authority of CDCR. To have warned plaintiff about the contaminated water, let they failed to do so. As they failed to warn the prison population at MSC and as this serious health hazard of contaminated water supply was being forced to consume by plaintiff, CDCR, MSC, protected their employees. By making a memorandum by computer. Failing to protect plaintiff from suffering any harm of medical issue by the contaminated water. Plaintiff is being FORCED to consume contaminated water by not making plaintiff aware of the existence of said inhumane conditions. And not providing relief from the relief from these inhumane conditions. [Clean water] are [unavailable].

4. Injury. State how you were injured by the actions or inactions of the Defendant(s).

Failed To Protect For Failing To Warn about Contaminated water & Failing To Provide clean drinking water.

5. Administrative Remedies.

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☐ Yes ☒ No
- Did you submit a request for administrative relief on Claim II? ☐ Yes ☒ No
- Did you appeal your request for relief on Claim II to the highest level? ☐ Yes ☒ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. Under 8547 Whistle Blower's Act A Plaintiff Need Not Exhaust Administrative Remedies To File A Suit. California State Auditor Case No 1209-1462

1 Claim II supporting facts
2 Continued as p 4a.

3 1.) Plaintiff asserts that (He), has been housed at MCSF, since
4 Feb of 2011, and that defendants have never posted any
5 notice or Memorandum to the whole inmate pop stating that the
6 water was contaminated.

7
8 2.) However MCSF, did in fact send out with regard to the
9 water and its Contamination, There was a Deceptive Memorandum
10 posted stating that the water was safe for consumption.
11 And it wasn't until recently that plaintiff learned of there allegedly
12 being CDCR, MCSF, memo's posted for visitor's in the visiting areas
13 warning visitor's of the contaminated water.

14
15 3.) Plaintiff asserts that MCSF has not provided a clean source of
16 water for himself, or the Prison Population's consumption. Even
17 though CDCR, MCSF, has the knowledge that the water supply is
18 in fact contaminated. Defendants have in fact had knowledge of the
19 existing problem since at least (2006), and the inmate
20 population still continues to suffer harm from the contaminated
21 water.

22
23 4.) Plaintiff asserts that all CDCR officer's at MCSF, are under
24 the Color of Law. And are also responsible for failure to
25 report misconduct. Which is a violation of CDCR's Memorandum
26 to all CDCR Peace officers warning them about the ZERO
27 TOLERANCE Policy PROHIBITING THE "CODE OF SILENCE AMONG
28 PRISON OFFICER'S FAILING, / REFUSING TO REPORT A CRIME, or MISCONDUCT.

page 4a.

CLAIM III

1. State the constitutional or other federal civil right that was violated: Violation of The 11th Amendment to the Const. (for Sovereign Immunity) 12 U.S.C. 241 & 242 Conspiracy To Deny Right Under Color of the Law."

2. Claim III. Identify the issue involved. Check **only one**. State additional issues in separate claims.

- | | | | |
|--|---|---|---------------------------------------|
| <input checked="" type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |

3. Supporting Facts. State as briefly as possible the FACTS supporting Claim III. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

1. Plaintiff asserts that Defendants "did infect on several occasions secret funds from the state, and federal agencies concerning this matter. Therefore violating their Constitutional Right To Sovereign Immunity under the Eleventh Amendment To The U.S."

2. Plaintiff makes References to the Quote's spoken By GREGORY LARSEN, Chief Regulatory Compliance for CDR. "We Have Spent over \$2 million, To Date in conducting a comprehensive site wide Investigation of The Storm Water Collection System at MSCP."

3. Plaintiff makes another references Quote from THE LADDER JOURNAL who contacted a Master Plumber To Discuss Investigating the THREE SEWER SYSTEMS at MSCP. "IT'S A VERY LOCAL PROCESS, LOOKING AT THE PHOTOS, IT CERTAINLY APPEARS THERE IS A LEAK. AND CONTAMINATION. THAT SHOULD NOT BE THERE. IT COULD BE THAT ONE OF THE SEWER LINES IS CONNECTED TO THE WRONG SYSTEM, CAUSING THE LEAK. IT COULD BE PIPES ARE BROKEN. A CATASTROPHIC FAILURE. WE'D WANT ACCESS TO ALL THE SYSTEMS AND EVERYWHERE WE CAN LOOK."

4. Injury. State how you were injured by the actions or inactions of the Defendant(s).

12 U.S.C. 241 & 242 "Conspired To Deny Right Under Color of the Law." Plaintiff asserts that All Defendants "did infect conspire to deny plaintiff his basic Human Rights to clean consumable water. Plaintiff also asserts defendants "Did infect Conspire."

5. Administrative Remedies.

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☐ Yes ☒ No
- Did you submit a request for administrative relief on Claim III? ☐ Yes ☒ No
- Did you appeal your request for relief on Claim III to the highest level? ☐ Yes ☒ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. Under 8977 Whistle Blower's Act A Plaintiff does Not Exhaust Administrative Remedies To File A Suit. California State Auditor Case No 1109-1462

If you assert more than three Claims, answer the questions listed above for each additional Claim on a separate page.

CLM III Supporting Facts Continued
as P 53.

We follow the flow of water, and can camera test all the lines I'm guessing it would take two weeks, certainly it could be completed in four or five weeks. With a couple cameras, going eight hours a day.

I'd charge \$125.00 an hour, looking at the whole system, you'd have your answer and a complete look at the entire MESP sewer system for \$5,000 a week (Monday - Friday). A five week investigation would total \$25,000. Once we know what we are dealing with pipes can be replaced with liners and the like, not an easy process, especially in a prison environment.

But I imagine you could move folks around as you repaired different sections like I said, it is a logical process. It wouldn't be easy, and if it is catastrophic, it would be hard to fix, but it certainly can be done."

4. Plaintiff asserts he is a state prisoner at MESP, and that my drinking water to this date has and is making me sick it is not clean. It doesn't smell clean. At any time you smell the water it has an odor of dirt, sewage, chemicals or POP. It's alleged that

There was a contract of Sept 9, 1985 for a sewage treatment plant, Has not Happend, CDRK, continues to allow a very serious Health Hazard Problem with contaminated water to go unresolved.

5. Plaintiff asserts that on the day of 8.5.2019, The water smelled and tasted like sewage in buildings 4, 2, 3, 1 as abt of inmates complained, I plaintiff lived in building #2

6. MESP, CDCR, has received continuous funding for a fix of a serious health matter from outside sources for some time and they do give a good speech abt what is being done to those who can't actually verify that nothing is being done, and hasn't for years. Still plaintiff along with MESP population continue to suffer from MESP's contaminated water supply.

7. Injury Continued.

to hide the fact from plaintiff, and inmate population of MESP that the water is or may be contaminated and dangerous to consume. And did in fact contract a Construction Crew From Sierra Communication and Construction Incorporated (SCCI) to Build a Culvert System which MESP & CDCR would use to hide the true extent of Contamination using California State Tax Payer Dollars.

E. REQUEST FOR RELIEF

State the relief you are seeking:

Plaintiff hereby seeks a Monetary sum of (\$10,000,000 +) Twenty Million Dollars Plus:
Compensatory Damages Plaintiff seeks (\$100,000,000 +) One Hundred Million Dollars Plus in
Punitive Damages, and a Governor's Pardon / Commutation of sentence for THE COURT
Case No. **117993** resulting in Immediate Release from Prison; Plaintiff seeks that
All taxes Both State & Federal To Be Paid in Full by the Defendants. And not taken
from Monetary sum Awarded to Plaintiff. "INJUNCTIVE RELIEF THAT ALL #171270
Design Prisons with Contaminated Water be brought up to the Health and safety/Codes.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 2-23 2020
DATE

[Signature]
SIGNATURE OF PLAINTIFF

N/A
(Name and title of paralegal, legal assistant, or
other person who helped prepare this complaint)

N/A
(Signature of attorney, if any)

(Attorney's address & telephone number)

ADDITIONAL PAGES

All questions must be answered concisely in the proper space on the form. If you need more space you may attach more pages, but you are strongly encouraged to limit your complaint to twenty-five pages. If you attach additional pages, be sure to identify which section of the complaint is being continued and number all pages. Remember, there is no need to attach exhibits to your complaint.

SHORT TITLE:

CASE NUMBER:

E. REQUEST FOR RELIEF Continued.

1. Under STATE & FEDERAL Law and FIRED.

2. Plaintiff also seeks Monetary Compensation From All Named Defendants in their Private Capacities in the following sums with liens to be placed against all worldly possessions, Bank Accounts, Pension, Future and Current Employment Checks, as follows:

1. First Defendant: Gavin Newsom (Governor State of California)
\$1,000,000 in Compensatory Damages. \$2,000,000 in Punitive Damages.

2. Second Defendant: Jerry Brown (Ex Governor State of California)
\$1,000,000 in Compensatory Damages. \$2,000,000 in Punitive Damages.

3. Third Defendant: Joe Lieberman (Ex Warden)
\$500,000 in Compensatory Damages. \$1,000,000 in Punitive Damages.

4. Fourth Defendant: Scott Heller (Ex Deputy Director)
\$500,000 in Compensatory Damages. \$1,000,000 in Punitive Damages.

5. Fifth Defendant: Ralph M. Traz (Deputy Director)
\$500,000 in Compensatory Damages. \$1,000,000 in Punitive Damages.

6. Sixth Defendant: Diana Tache (Secretary of Health Care)
\$250,000 in Compensatory Damages. \$500,000 in Punitive Damages.

7. Seventh Defendant: Bonnie Gipsan (Deputy Director of Facility Operation)
\$250,000 in Compensatory Damages. \$500,000 in Punitive Damages.

8. Eighth Defendant: Terry Bettercourt (Regional Facilities Mgr)
\$1,000,000 in Compensatory Damages. \$2,000,000 in Punitive Damages.

9. Ninth Defendant: Tamir Ahmed (Associate Director)
\$250,000 in Compensatory Damages. \$500,000 in Punitive Damages.

10. Tenth Defendant: Gregory Larrabee (Environmental & Regulatory Compliance)
\$250,000 in Compensatory Damages. \$500,000 in Punitive Damages.

(Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, not line numbers):

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Page 6.1

SHORT TITLE:

CASE NUMBER:

E. REQUEST FOR RELIEF (Continued)

11. Eleventh Defendant: Harold Hall. (Superior Water Central Regional Water)
\$200,000⁰⁰ in Compensatory Damages. \$400,000⁰⁰ in Punitive Damages.
12. Twelfth Defendant: Andrew Alievogt. (Assistance Executive Officer Central Valley Regional Water)
\$200,000⁰⁰ in Compensatory Damages. \$400,000⁰⁰ in Punitive Damages.
13. Thirteenth Defendant: City of Irvine. (Irvine California)
\$3,000,000⁰⁰ in Compensatory Damages. \$4,000,000⁰⁰ in Punitive Damages.
14. Fourteenth Defendant: County of Amador. (County of Amador)
\$3,000,000⁰⁰ in Compensatory Damages. \$4,000,000⁰⁰ in Punitive Damages.

Plaintiff also hereby seeks that all taxes on all Monetary Compensation be paid in Total by all Defendants and that all Court fees be paid by all Defendants as well.

(Required for verified pleading) The items on this page stated on information and belief are (specify item numbers, not line numbers):

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Page 60